

UNITED STATES BANKRUPTCY COURT FOR
THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	
	:	
CHARLES A. HAYES III dba The Commander	:	Case No. 5-18-04040
Debtor	:	Chapter 13
	:	
	:	
BAYVIEW LOAN SERVICING, LLC, a Delaware:	:	
Limited Company	:	
Movant	:	
v.	:	
CHARLES A. HAYES III dba The Commander	:	
Respondent	:	
CHARLES J. DEHART III, Trustee	:	

**DEBTORS RESPONSE TO MOTION OF BAYVIEW
FOR RELIEF FROM THE AUTOMATIC STAY**

The Response of the above Debtors, by her attorneys Doran & Doran, PC
is as follows:

1. Admitted.
2. Denied. The property address is incorrect.
3. Admitted.
4. Admitted in part. It is admitted that Bayview has a mortgage on property of the Debtor but the address is not as stated in paragraph 2 above.
5. Admitted
6. Admitted in part. The Debtor proposed in the plan to negotiate a loan modification because the property had been damaged by fire prior to the bankruptcy filing.
7. Denied and proof demanded as to the computation.
8. Denied.
9. Denied and proof demanded.
10. Denied.

WHEREFORE, the Debtor requests this Court deny the motion for relief.

DORAN & DORAN, PC

Dated: May 15, 2020

BY: /s/Lisa M Doran
LISA M. DORAN, ESQUIRE
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Certification of Service

The undersigned, Lisa M Doran, hereby certifies that a true and correct copy of the foregoing is served on the following electronically, automatically upon filing, through the ECF system on the 15th day of May 2020:

Charles J DeHart, III (Trustee)
TWecf@pamd13trustee.com

James Warmbrodt on behalf of Creditor Bayview Loan Servicing, LLC, a Delaware Limited Liability Company
bkgroup@kmlawgroup.com

_____/s/ Lisa M Doran

Lisa M Doran